

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD.;  
and SAMSUNG ELECTRONICS  
AMERICA, INC.,

*Defendants.*

Civil Action No. 2:22-cv-00422-JRG-RSP

**JURY DEMANDED**

**JOINT MOTION FOR ENTRY OF AGREED  
PROTECTIVE ORDER**

Pursuant to the Court's Order setting a deadline to file a proposed Protective Order (D.I. 12), Plaintiff Headwater Research, LLC ("Headwater") and Defendants Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (collectively, "Defendants" or "Samsung"), (collectively, the "Parties") hereby jointly request that the Court enter the proposed Protective Order, attached hereto as Exhibit A.

Dated: April 4, 2023

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Respectfully submitted,

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